

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ARNE H. FREDLY,
HENG REN SILK ROAD INVESTMENTS
LLC, HENG REN INVESTMENTS LP,
derivatively on behalf of SINO AGRO FOOD,
INC.,

Plaintiffs,

v.

SINO AGRO FOOD, INC., LEE YIP KUN
SOLOMON, TAN POAY TEIK, CHEN BOR
HANN, LIM CHANG SOH.,

Defendants,

and

SINO AGRO FOOD, INC.,

Nominal Defendant

Case No. 19-cv-02680 (JMF)

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR
FINAL APPROVAL OF
DERIVATIVE SETTLEMENT**

To: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE THAT, on October 13, 2020, Plaintiffs, by and through their counsel, will move the Court, before the Honorable Jesse M. Furman, United States District Court Judge for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, Court Room 1105, New York, NY 10007, for entry of a [Proposed] Order Approving Settlement And Order of Dismissal With Prejudice.

This Motion is based this Notice of Motion, the following Memorandum of Points and Authorities, the accompanying Declaration of Angus Ni and exhibits thereto, the Second Declaration of Mr. Peter Halesworth, as well as the record in this action, and such other matters and argument as may be presented to the Court.

Dated: September 15, 2020

AFN LAW PLLC

By: _____

A handwritten signature in black ink, appearing to be 'A. Ni', written over a horizontal line.

Angus F. Ni
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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2020, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Richard Babnick RBabnick@SRF.LAW

Attorney for Defendants

By: /s/ Angus F. Ni
Angus F. Ni